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October 21, 2016

Felicia Marcus, Chair State Water Resources Control Board 1001 I Street Sacramento, CA 95814	Katheryn Landau State Water Resources Control Board 1001 I Street Sacramento, CA 95814
Timothy Nelson State Water Resources Control Board 1001 I Street Sacramento, CA 95814	

Subjects: Second Revised Notice, Amendment to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary and Supporting Draft Revised Substitute Environmental Document - Phase 1

Notice of Opportunity for Public Comment and of Public Workshop on Working Draft Scientific Basis Report for Potential Amendments to the Water Quality Control Plan - Phase 2 update

Dear Chair Marcus, Ms. Landau, and Mr. Nelson:

Restore the Delta appreciates that the State Water Resources Control Board has extended the comment period deadline on the above Phase 1 document until January 17, 2017. While we requested ten more days than were provided, the Board's decision to extend the comment period into January appears to recognize the reality that groups that are actively participating in California WaterFix proceedings need significant additional time to enable their full and meaningful participation in related processes associated with the Bay-Delta Water Quality Control Plan, Phase 1.

However, we wish to register our disappointment and exasperation with the scheduling decisions by the State Water Board in the above matters that have occurred subsequent to its decision to extend the Phase 1 comment period. First, we request that, at a minimum, the Stockton hearing on the Phase 1 plan amendment and recirculated draft

substitute environmental document (RSED) be rescheduled from December 16 to a date in the second week of January 2017. A number of Delta region citizens, many of whom are farmers and farmworkers, leave for the holidays, while others have family and community holiday celebration commitments here and elsewhere. The mid-December hearing date is inconvenient at best and certainly not indicative of a desire to maximize public comment on very important issues. We urge you to reschedule the Stockton hearing date for mid-January 2017.

We further request that the Board allow additional time to review the extensive draft Phase 2 scientific basis report. Currently, the Board has provided no more than 58 days to review the 388 page report. By comparison, in 2010, the draft Phase 1 San Joaquin River "technical report" comment period provided the public with 38 days to review just 114 pages of information. The Phase 2 document is nearly three and a half times longer (not including the modeling attachment to Appendix A). To allow adequate time to review this technical document, we request that the comment period on the Phase 2 scientific basis report close in late February 2017. As noted above, Restore the Delta and many other interested parties are participating in the California WaterFix proceeding. We will be monitoring case presentations and preparing to present our own case in chief at the same time that comments would need to be prepared and at the same time that Delta region community members and other members of the public are preparing for the holidays.

While the State Water Board perhaps received an expanded budget for this fiscal year from the Governor to accomplish its workload, Restore the Delta, other non-governmental organizations, and other community groups, already stretched thin to participate in the WaterFix proceeding, have seen no comparable increase in our organizations' capacities to keep up with these proliferating State Water Board processes and reports. These matters are of critical importance to the future health of the Delta and the to the wellbeing of Delta region residents. In setting schedules for the Water Quality Control Plan amendment without adequate consideration of the schedule for the ongoing WaterFix hearing, the Board imposes an unfair burden on many with vital interests in both processes. If the Board wants the fullest possible participation in these processes by those who will be directly affected by the outcomes of each, we implore you to apply greater care and sensitivity in scheduling comment periods and public hearings in the future concerning these and related matters.

To summarize, we request that the Board reset the Stockton date for a public hearing on the Phase 1 RSED for a mid-January date and extend the deadline on the draft Phase 2 scientific basis report well to late February 2017 so that Restore the Delta and many other interested groups and individuals may participate effectively in both phases.

Thank you for considering these requests. If you have questions, please contact either of us.



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